EXHIBIT 3

In the Matter Of:

UNITED STATES OF AMERICA v

GOOGLE, LLC

ITAMAR SIMONSON, PH.D.

February 28, 2024

73

1   begin working on this matter?

2   A.   In 2021. Soon after I

3   started working on this case.

4   Q.   And how did you make the

5   decision to use Advertiser Perceptions on

6   this matter?

7   A.   So I think, obviously, that

8   was an important decision, and I wanted

9   to do my due diligence, if you will, on

10   that issue. So I learned about them,

11   looked at other surveys or survey reports

12   they have done. I interviewed a couple

13   of people from Advertiser Perceptions. I

14   think -- and I read about them, whatever

15   I could find on the internet.

16   Q.   Did you consider any other

17   entities to perform that role?

18   A.   I mean, initially, I think

19   there were some other names that came up,

20   but I don't think any of them -- that

21   there was anyone I could find that had

22   the capability to undertake such a

23   survey.

24   I mean, not to -- I guess,

HIGHLY CONFIDENTIAL

ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.)

Deposition Date: 02/28/2024

Deponent: Professor Itamar Simonson

CORRECTIONS

Page	Line	Change	Reason
13	18	The words "list in hindsight. It" should read "list in hindsight, it"	Transcription error
18	4	The word "There" should read "They"	Transcription error
18	5	The words "headed a position" should read "had a deposition"	Transcription error
30	12	The word "doctorate" should read "doctoral"	Transcription error
30	15	The word "or" should read "or the"	Transcription error
31	10	The word "receive" should read "received"	Transcription error
31	10	The words "Nobel Prize" should read "the Nobel Prize"	Clarification
34	22	The word "group" should read "groups"	Transcription error
37	18	The word "likely" should read "likelihood of"	Transcription error
43	4	The words "ranked ordered" should read "rank ordered"	Transcription error
44	16	The word "decisionmaking" should read "decision making"	Transcription error
44	21	The word "decisionmaking" should read "decision making"	Transcription error
44	24	The words "much better and rely" should read "much better at relying"	Transcription error
46	10	The word "Are" should read "They're"	Transcription error
47	10	The words "work for" should read "work for a"	Clarification
47	10	The word "firm" should read "firm?"	Transcription error
52	21	The words "there's, like" should read "that's like"	Transcription error
55	21	The words "testify about" should read "testify about it"	Transcription error

57	10	The word "Archer-Daniels" should read "Archer Daniels"	Transcription error
57	23	The word "listed" should read "not listed"	Transcription error
57	23	The word "not" should read "no"	Transcription error
58	11	The words "testify. It" should read "testify if it"	Transcription error
58	12	The word "in" should read "on"	Transcription error
65	10	The words "can find" should read "can find it"	Transcription error / clarification
74	18	The word "was" should read "were"	Transcription error
85	13	The word "Abarantes" should read "Abrantes"	Transcription error
91	21	The word "programatic" should read "programmatic"	Transcription error
92	5	The word "programatic" should read "programmatic"	Transcription error
92	17	The word "programatic" should read "programmatic"	Transcription error
101	20	The word "programatic" should read "programmatic"	Transcription error
101	23	The word "programatic" should read "programmatic"	Transcription error
102	13	The word "programatic" should read "programmatic"	Transcription error
102	21	The word "programatic" should read "programmatic"	Transcription error
104	16	The word "programatic" should read "programmatic"	Transcription error
109	4	The word "less" should read "less than"	Transcription error
110	7	The words "there was" should read "it was about"	Transcription error
111	2	The words "just a get" should read "just to get"	Transcription error
111	15	The words "there are" should read "these were"	Transcription error
112	19	The word "programatic" should read "programmatic"	Transcription error
116	8	The word "recognize" should read "recognized"	Transcription error
116	16	The word "agency" should read "and agency"	Transcription error
125	11	The word "one" should read "an"	Transcription error

128	6	The word "pick" should read "picked"	Transcription error
130	2	The words "report list" should read "report lists"	Transcription error
132	14	The words "ad pros" should read "Ad Pros"	Transcription error
133	3	The words "ad pros" should read "Ad Pros"	Transcription error
133	17	The words "ad pros" should read "Ad Pros"	Transcription error
133	21	The words "ad pros" should read "Ad Pros"	Transcription error
134	7	The words "ad pros" should read "Ad Pros"	Transcription error
134	14	The words "ad pros" should read "Ad Pros"	Transcription error
134	19-20	The words "ad pros" should read "Ad Pros"	Transcription error
135	16	The words "ad pros" should read "Ad Pros"	Transcription error
135	18	The words "ad pros" should read "Ad Pros"	Transcription error
136	15	The words "ad pros" should read "Ad Pros"	Transcription error
141	17	The word "kept" should read "keep"	Transcription error
143	2	The word "resident" should read "residence"	Transcription error
148	1	The words "might have followed" should read "might have been followed"	Omission
149	16	The words "apropos all" should read "all"	Transcription error
155	4	The word "attorney" should read "attorneys"	Transcription error
156	23	The word "interview" should read "interviewer"	Transcription error
157	23	The word "your" should read "the"	Transcription error
158	23	The word "received" should read "received the"	Transcription error
177	6	The word "did" should read "do"	Transcription error / clarification
184	10	The words "That saying" should read "That said"	Transcription error
194	22	The word "programatic" should read "programmatic"	Transcription error
200	1	The word "alternative" should read "alternatively"	Transcription error
200	9-10	The words "you also serve as searcher. You" should read "you also as a researcher, you"	Transcription error
202	21	The words "than about those" should read "than on those"	Clarification
206	2	The word "programatic" should read "programmatic"	Transcription error
206	5	The word "programatic" should read	Transcription error

		"programmatic"	
206	18	The word "No" should read "Now"	Transcription error
210	5	The word "point" should read "points"	Transcription error
212	16	The word "programatic" should read "programmatic"	Transcription error
213	5	The word "to" should read "the"	Transcription error
213	17	The words "from between" should read "between"	Transcription error
218	24	The word "that" should read "that's"	Transcription error
221	8-9	The words "with all but" should read "we talk about"	Transcription error
224	5	The word "result" should read "results"	Transcription error
225	17	The words "southern district" should read "Southern District"	Transcription error
236	3	The words "the hypothesis" should read "hypotheses"	Transcription error
236	9	The words "product called" should read "protocol"	Transcription error
239	7	The word "some" should read "sunk"	Transcription error
241	10	The word "clear" should read "clear?"	Transcription error
242	9	The word "is" should read "were"	Transcription error
244	16	The word "right" should read "the right"	Transcription error
249	8	The word "term" should read "terms"	Clarification
255	14	The word "they" should read "he"	Transcription error
257	12	The words "just Dr. Hoyer" should read "Dr. Hoyer just"	Transcription error
272	7	The word "marketings" should read "marketing"	Transcription error
272	10	The word "criteria" should read "criterion"	Transcription error
274	5	The word "programatic" should read "programmatic"	Transcription error
279	21	The words "you see if" should read "if you see"	Transcription error
287	15	The word "Volkswagon" should read "Volkswagen"	Transcription error
295	14	The word "effect" should read "a fact"	Transcription error
295	15	The words "between – about" should read "between about"	Transcription error

298	7	The word "questions" should read "question"	Transcription error
298	21	The words "experts who prepare" should read "expert who prepared"	Transcription error / clarification
299	12	The word "line" should read "lines"	Transcription error
309	7	The word "were" should read "who were"	Transcription error
318	20	The words "very many" should read "many very"	Transcription error
319	1	The word "patterns" should read "patents"	Transcription error
335	2	The words "No respondents" should read "No respondent"	Transcription error
342	13	The word "never" should read "they never"	Transcription error
343	11	The words "attribute. That's" should read "attribute that's"	Transcription error
345	7	The word "seller" should read "sellers"	Transcription error
346	7	The word "at" should read "to"	Transcription error
348	14	The word "programatic" should read "programmatic"	Transcription error
349	11	The words "this question" should read "these questions"	Transcription error
351	12	The word "it" should read "if it"	Transcription error
352	16	The word "programatic" should read "programmatic"	Transcription error
352	24	The word "programatic" should read "programmatic"	Transcription error
353	14	The word "programatic" should read "programmatic"	Transcription error
354	7	The word "programatic" should read "programmatic"	Transcription error
354	14	The word "programatic" should read "programmatic"	Transcription error
354	16	The word "programatic" should read "programmatic"	Transcription error
354	23	The word "programatic" should read "programmatic"	Transcription error
355	5	The word "programatic" should read "programmatic"	Transcription error
355	14	The word "programatic" should read "programmatic"	Transcription error
358	22	The word "programatic" should read	Transcription error

		"programmatic"	
361	9	The word "do" should read "do it"	Clarification
362	3	The word "programatic" should read "programmatic"	Transcription error
363	7	The word "substitutions" should read "substitution"	Transcription error
364	8	The word "programatic" should read "programmatic"	Transcription error
364	11	The word "programatic" should read "programmatic"	Transcription error
366	22	The words "they ask" should read "they were asked"	Transcription error
370	2	The word "programatic" should read "programmatic"	Transcription error
371	2	The word "programatic" should read "programmatic"	Transcription error
383	6	The words "to the" should read "to"	Transcription error
383	15	The word "Number" should read "number"	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefor.

Date : 3/28/2024

I. Simonson

Itamar Simonson, Ph.D.

392

1

2   ACKNOWLEDGMENT OF DEPONENT

3

4   I, <u>Itamar Simonson</u>, do

5   hereby certify that I have read the

6   foregoing pages, 1 - 393, and that the

7   same is a correct transcription of the

8   answers given by me to the questions

9   therein propounded, except for the

10   corrections or changes in form or

11   substance, if any, noted in the attached

12   Errata Sheet.

13

14

15   _____   3/28/2024

16   ITAMAR SIMONSON, Ph.D.   DATE

17

18

19   Subscribed and sworn
       to before me this
20   _____ day of _____, 20_____.

21   My commission expires:_____

22

23   _____
       Notary Public

24